

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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U.S. DISTRICT COURT
SAN JUAN, PR

**MERIDA RIVERA BAEZ
URB. VEREDAS
126 CAMINO DE LAS PALMAS
GURABO PR 00778**

PROMESA

Title III

No. 17 BK 3283-LTS

CLAIMANT

VS

(Jointly Administered)

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO**

**This filing relates to the
Commonwealth, HTA and ERS**

AS REPRESENTATIVE OF

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors

IN RESPONSE TO THE ONE HUNDRED THIRTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO DEFICIENT CLAIMS ASSERTING INTEREST BASED ON SALARY DEMANDS, EMPLOYMENT OR SERVICES RENDERED

TO THE HONORABLE COURT:

Comes now Merida Rivera Baez, in my own right, and respectfully states and requests:

- 1. On July 7, 2018, I filed Prime Clerk Proof of Claim Number (POC) 157637 against the Employees Retirement System of Government of the Commonwealth of Puerto Rico (the "ERS").**
- 2. The case number under which my POC appears is 17 BK 03283-LTS.**
- 3. I consider that case number 17BK 03566-LTS also applies to me since my claim is against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.**
- 4. On January 14, 2020, the Commonwealth of Puerto Rico (the "Commonwealth"), the Puerto Rico Highways and Transportation Authority("HTA") and the "ERS", by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board") as the representative of the Commonwealth, HTA and ERS, filed the "One Hundred Thirty- First Omnibus Objection" to deficient claims listed on Exhibit A.**

5. The One Hundred Thirty- First Omnibus Objection seeks for the Court to disallow the proofs of claim listed on Exhibit A thereto, which includes my POC No. 157637 on page 101 of 173 line 583.

6. The Objection states that letters were sent to each claimant who filed Deficient Claims requesting additional information and supporting documentation, but the claimants did not respond to the mailing.

7. Let the Honorable Court be informed that I do not recall having received such a request for additional information.

8. In my POC 157637 I inadvertently failed to include a certification issued from the Employees Retirement System of the Government of the Commonwealth of Puerto Rico asserting as to the pension being received and a certification from the Department of Education asserting my years of service. It has been impossible for me to obtain any official document stating amounts owed to me.

9. I have prepared three worksheets which reflect, to the best of my knowledge, the amounts owed to me:

Exhibit 1.	3% COLA increase	\$11,499.52
Exhibit 2.	"Romerazo" Law 89 of 1984	\$28,800.00
Exhibit 3.	"Pasos" Yearly increase	<u>\$3,000.00</u>
Total estimated amount of my claim.		<u>\$43,299.52</u>

10. With this filing I'm including a.) Three Exhibits which summarize my claims b.) Copy of Law 62 of September 4, 1992 c.) Certification of my pension issued by the Puerto Rico Retirement System for Teachers d.) Certification from the Department of Education as to my years of service.

11. With this filing I request that POC 48085 be included as a legitimate claim and that the "One Hundred Thirty- First Omnibus Objection" to the deficient claims BE DENIED.

12. Contact Information:

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Certification of Service

I hereby certify that the original of this document was filed with the Clerks Office and copy of the original was mailed to the following:

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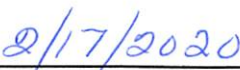
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Respectfully submitted,



Merida Rivera Baez



Dated